

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, and)	
JOHN MEINERS, and DANIEL UMPA,)	
individually and on behalf of all others)	
similarly situated,)	
)	
Plaintiffs,)	Case No. 4:23-cv-00788-SRB
)	[Consolidated with 4:23-cv-00945-SRB]
v.)	
)	Judge Stephen R. Bough
NATIONAL ASSOCIATION OF)	
REALTORS, <i>et al.</i> ,)	
)	
Defendants)	

**NOTICE OF PENDING SETTLEMENT AND JOINT
MOTION TO STAY CASE AS TO WILLIAM RAVEIS REAL ESTATE, INC.**

Plaintiffs Don Gibson, Lauren Criss, John Meiners, and Daniel Umpa (collectively “Plaintiffs”), and Defendant William Raveis Real Estate, Inc. (“WRRE”) (together with Plaintiffs, the “Parties”) respectfully provide notice to the Court that the Parties have reached a binding term sheet to settle all claims asserted against WRRE in the above-captioned consolidated action as part of a proposed nationwide class settlement. The settlement was jointly negotiated with counsel for all Plaintiffs. This agreement is subject to the Court’s approval under Federal Rule of Civil Procedure 23. Consistent with the Parties’ agreement, Plaintiffs will promptly file a motion in this Court for preliminary approval of the proposed settlement.

The Parties hereby jointly stipulate and request that the Court stay all deadlines and proceedings solely as to WRRE to preserve the resources of Plaintiffs, WRRE, and the Court, and to seek preliminary and final approval of the settlement.

The Parties agree that this Notice and the stay requested herein shall not constitute a waiver of any claims or defenses, including but not limited to: (a) any jurisdictional or venue defenses

that may be available under Rule 12 of the Federal Rules of Civil Procedure, statutory law, or common law (including but not limited to personal jurisdiction or improper venue defenses), (b) any arbitration rights; (c) any affirmative defenses that may be available under Rule 8 of the Federal Rules of Civil Procedure, statutory law, or common law, or (d) any statutory or common law defenses that may be available to WRRE in this or any other related actions.

Dated: March 12, 2025

Respectfully submitted by:

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CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to counsel of record for this case.

s/ Benjamin H. Diessel
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